



# WYOMING MINING ASSOCIATION

1401 Airport Parkway, Ste. 230 - Cheyenne, WY 82001 - (307)-635-0331

October 4, 2021

National Coal Program Review  
C/O Mr. Thomas Huebner  
BLM Wyoming State Office  
5353 Yellowstone Road  
Cheyenne, Wyoming. 82009

Submitted electronically to: [BLM\\_HQ\\_320\\_CoalProgramReview@blm.gov](mailto:BLM_HQ_320_CoalProgramReview@blm.gov)

**RE: Comments of the Wyoming Mining Association on the Notice of Intent to Conduct a Review of the Federal Coal Leasing Program and to Seek Public Comment (86 Fed. Reg. 46873, Aug. 20, 2021)**

## **General Comments**

The Wyoming Mining Association (WMA) is a statewide trade organization that represents and advocates for 30 mining company members producing bentonite, coal, trona and uranium, as well as companies developing gold and earth element deposits. WMA also represents over 100 associate member companies, one railroads, two electricity co-ops, and one advanced nuclear power company.

The WMA appreciates the opportunity to address the Notice of Intent to Conduct a Review of the Federal Coal Leasing Program.

Unfortunately due to the politicization of the issue of coal generated electricity, WMA is concerned about a fair and impartial review. WMA believes this process to be an unnecessary expenditure of public funds and a diversion of public employee attention away from the real issues associated with guaranteeing the American taxpayer a reasonable return on the public resource, and more importantly, keeping the resource available and viable into the future.

The Bureau of Land Management (BLM) has been charged with reviewing and fixing a program that is not broken, on the basis of misinformation and politics. It is our contention that if the leasing process were truly understood, and if the facts associated with the cost and reliability of other sources of electrical energy were known, this exercise would be unnecessary.

To reiterate, our deep concern is that this exercise is being conducted with the intent to place the federal coal resource off limits. Should BLM choose to continue to pursue its review, WMA offers the following comments with the hope that constructive and positive improvements might be made, and that the agency avoid over-politicization of the program.

## **Fair Return**

[www.wyomingminning.org](http://www.wyomingminning.org)

WMA believes the BLM Federal Coal Leasing program has been working as intended and has been a remarkable success and that taxpayers receive a fair return. Wyoming is the top coal producing state in the nation with the vast majority of this production coming from federally leased coal. In 2020, the financial contribution from this coal to state and local governments in the form of taxes, royalties and fees was over \$550 million. Wyoming's share of federal mineral royalties – royalties paid to mine the leased coal - was over \$137 million. The industry employs nearly 4,800 individuals directly with a payroll of nearly \$500 million, and over 2,000 contractors. The average coal mining job pays over \$83 thousand per year, well above the state average. And every coal mining job supports another 2-3 jobs in the service and supply industry. Revenues generated from the federal coal resource fund federal, state and local governments, highways and roads, schools and community colleges, and the University of Wyoming. Revenues from Coal Lease Bonus Bids, over \$2.6 billion, have built new schools and facilities in every county in Wyoming over the last 3 decades. The return on federal coal is obvious for Wyoming, and is by any reasonable measure fair. The impact the industry and the coal leasing program has at the state level for Wyoming is simply huge. Real jobs, real revenue, real people.

Considering that Wyoming accounts for 85% of all federal coal production, it couldn't be clearer that taxpayers are receiving a fair return and excellent value from the BLM Federal Coal Leasing Program in terms of revenue and jobs. Again, the idea that the American public is somehow being "shortchanged" is simply untrue.

The BLM Federal Coal Lease Program creates a great return not only for those who directly benefit from mining, royalties and bonus bids, like we do in Wyoming. It also provides value for those across America who rely on affordable electricity.

### **Climate Impacts**

The Federal Coal Leasing Program is responsible for no climate or environmental impacts. Rather, impacts occur downstream use through electricity generation using the coal resource. WMA recognizes the Administration's political efforts to tie all human activity to perceived impacts on global climate change, and supports the State of Wyoming's leadership in development of viable Carbon Capture Use and Storage (CCUS) technology to keep coal fired generation viable.

Through technological and emission control improvements, reductions in actual criteria pollutants under the Clean Air Act, such as mercury, sulfur dioxide, and particulate matter, has been an unqualified success. There is no reason to believe that with continuing advances in CCUS technology the same success cannot be achieved for carbon dioxide emissions. However, this will not happen if the coal resource is placed off limits through overburdensome changes to the leasing process. This would not be in the best interest of either the state of Wyoming or Americans that depend on reliable power every day.

### **Socio-Economic Considerations**

Coal fired generation remains the most reliable, low-cost source of electricity in the United States. Coal generation is reliable and resilient where renewables such as wind and solar (by

their very nature) are not. The socio-economic benefits cannot be understated. Coal fired generation is readily available and dispatchable 24 hours a day, 7 days a week, 365 days of the year. It is reliable where heavily subsidized renewables are subject to weather and daylight. Its cost is consistently low and not subject to the price swings of natural gas. Reliable, low-cost electricity is necessary to power homes, businesses, schools, and hospitals, and American life.

Recent winter weather events show dramatically the impacts of removing coal fired generation from the nation's power grid. Had the ERCOT grid in Texas not retired much of its coal fleet once fed by federal coal and replaced it with unreliable renewables, the catastrophic grid failure during the winter storm of 2020, resulting in deaths and billions in economic damage could have been largely avoided. Conversely, the MISO grid to the north was able to weather the storm because of significantly increased coal fired generation from its online assets, largely powered by federal coal. The socio-economic benefits from reliable coal fired electricity generation are crystal clear.

### **Exports**

The amount of federal coal exported to overseas utilities is negligible. In the event that conditions improve and increased export capacity becomes available, WMA believes that federal coal mined and sold to international buyers should be treated similarly to domestic buyers. In Wyoming, coal producers pay an average of 40% of the sales price of coal in taxes, fees and royalties. Revenue generated from these amount to an estimated \$500 million annually to state and local governments. Expanded markets for federal coal mined in Wyoming are in the financial interest of the state, as well as the federal government pursuant to the Mineral Leasing Act. Exported coal historically demands a higher sales price because it includes the transportation costs which are paid by the producer. This is different than the situation for coal sold domestically where transportation costs are paid by the customer. For the coal producer, these higher sales prices do not necessarily translate to higher profits on exported coal. WMA encourages the agency to avoid measures that would act as a disincentive to exporting federal coal to include raising costs, regulatory barriers or implementing arbitrary "social costs of carbon" standards. These actions would be contrary to the agency's charge of responsible management of the resource.

### **Energy Needs**

Coal remains the only abundant, consistently low-cost, and reliable source of electricity generation in the United States. Coal fired base load generation remains critical as the nation moves down the path of over-reliance on unreliable alternative energy sources such as wind and solar, and natural gas subject to price swings. Any effort to restrict the federal coal resource will have a negative effect on Americans.

### **Other Input**

Potential new leasing models, or potential reforms to the previous or existing leasing models of regional leasing and lease by application

The current leasing model accomplishes what it set out to do. While there may be other ideas that will be considered, BLM needs to first evaluate the efficacy of the charges and allegations that have led to this moratorium and programmatic evaluation. WMA contends that the current model is suitable and flexible enough to address any legitimate concerns that have been voiced, but that most of the issues and concerns are not legitimate with regard to leasing. They are instead a smoke screen for those who believe coal extraction and use can and should be eliminated.

The BLM established two processes for the leasing of coal in 1979. In the regional leasing process, BLM identifies the coal tracts for leasing. The second process, known as the lease by application process, is based upon public nominations of potential coal lease tracts. The two pathways are rather different but they touch all the same points en route to issuing federal coal leases. Each process was designed to accomplish a number of things including, but not limited to assuring fair market value, promoting competition, eliminating speculative leasing, and promoting diligent lease development. All of these things are still done today in this “decertified” coal leasing process.

By the late 1980’s the Department of Interior elected to adopt the lease by application process in many of the major coal mining regions of the country. This change was made for a number of reasons. Perhaps the most compelling reason was that the regional leasing process was determined to be inadequate because many lease tracts identified by BLM received no bids at all yet the country was being urged toward energy independence. In moving from the regional leasing process to the lease by application process, BLM decertified areas for the purpose of introducing the lease by application (LBA) process. The term “decertified” was an inaccurate and unfortunate choice of words.

Apparently, some opponents of federal coal leasing want us to believe this means that some amount of control, evaluation, or involvement by the government overseers was given up. The fact is that no protections were lost and no opportunities or control were given away by the Department of Interior when they transitioned from the regional leasing process to the lease by application process. Critics who make this claim today cannot cite any facts to support their position. In this scoping process, BLM should evaluate and confirm that the two processes have very similar requirements. Moreover, BLM should evaluate the Wyoming State BLM Office coal leasing program. You will find that this state office has configured their coal leasing program precisely as the Federal Coal Leasing Amendments Act of 1976 and subsequent rulemakings intended. If other states have not, this is no reason to abandon a program which has brought billions of dollars to the American taxpayer.

Despite claims to the contrary, BLM rules require the agency to develop fair market value estimates prior to each proposed lease sale. Over nearly three decades the fair market value was not challenged as being deficient until certain organizations determined that coal mining and use were no longer acceptable to them. Because the true fair market value figures are held confidential by the agency, it is curious that some organizations can claim that fair market value has been too low and that they can actually calculate how much the American taxpayer has been short-changed. These claims are clearly based on assumptions and should not be interpreted by the BLM to be factual.

Competition in the leasing process is a function of many factors that fall completely outside the purview of the BLM. To believe that BLM can guarantee competition through rule-making is absurd, suggesting the BLM somehow controls or has sufficient influence over the national and international coal markets, coal transportation, coal sales and so forth. By definition and rule, the American taxpayer receives a fair return (fair market value or above) on the resource whether there is one bid or many bids. What the BLM can do in their rules is to assure that the rules governing the U.S. federal coal leasing process do not discourage competition or coal production.

Current BLM rules have requirements which were designed to prohibit speculation in the federal coal leasing process. This is seen in the rules at 43 CFR Subpart 3483 which require and quantify diligent lease development. Claims that the United States coal industry speculates with federal coal leases have no factual basis, and the BLM does not need a moratorium or a 3-year evaluation to reach that conclusion. The BLM's scoping report should confirm this fact.

Considerable wisdom was employed in developing the LBA process. But the basic premise is that the enormity of the leases and the investment required to obtain a lease preclude development without a business plan. Companies showed they were unwilling to invest in leases identified by the BLM for any number of reasons: too large, too small, uneconomical mining conditions; too distant from coal processing facilities; and so forth. The logic behind the LBA process is that those who must bear the cost of the mining are best equipped to identify the tracts of land to be mined. Mining companies, not governments, will choose the tracts that will be most economical to mine and on which they are willing to invest their future. (The wisdom of this will be seen later in these comments when you see how large the investment is and how long before those who invest see any return on their investment.) But the key to the current process is that the BLM has the right and obligation to place the value on the lease.

WMA contends the current leasing process is meeting the goals that were set for it decades ago and that those goals are still suitable today. As part of the scoping process:

- BLM's scoping evaluation must reveal that the claim made by detractors that the fair market value is not providing an adequate return on the resource, cannot be substantiated. The results of the evaluation will verify that the fair market value issue needs to be put to rest. And the rules do not need to be fixed.
- BLM must disclose the absurdity of the belief that they can guarantee competition in the leasing process through rulemaking. Instead BLM must assure that the current rules do not discourage competition. In fact, BLM must reach the conclusion that their determination of an undisclosed fair market value actually works as competition, driving bids up to ensure this threshold is met or exceeded.
- BLM must consult their files for compliance with the regulatory citations above to reveal that any attempts to engage in speculation have been properly dealt with. BLM also needs to review their lease records regarding diligent development to conclude that diligence has occurred in the vast majority of leases, and where it has not, the proper remedies were applied. In short, the BLM needs to conclude and to publish the findings that the 1976 statutory fixes to speculation were successful. Further fixes are unnecessary.

### Other approaches to increase competition in the leasing process

Many of the opponents of the current leasing program have called for increasing royalties and fair market value as the means for increasing competition for federal coal leases. They allege that the program is broken because, on many occasions, only one bid has been submitted for a lease. They do not recognize that participation in the program is largely a statement about the cost to participate in the process. It is not a deficiency of the program. Moreover, it is ludicrous to believe that BLM can or should create rules and a leasing program that will increase competition.

1. The federal coal leasing program is a rigorous, cumbersome, very lengthy, and therefore a very costly program that sets a high bar for those who would choose to participate.

The federal coal leasing program requires considerable capital to participate thereby discouraging some otherwise interested and qualified companies from participating. Participation requires up-front investments of millions-to-over a billion dollars for significant periods of time before a return is ever realized. This severely limits the number of entities interested in or even capable of participating in the program.

Leasing federal coal is only one piece of a much larger program that is designed to provide a financial return on the coal to the American taxpayer. For the American taxpayer to realize the full value of the coal, it must be not only leased, but also mined and sold. In Wyoming, for example, it can typically take five to seven years to successfully acquire a lease for federal coal. At the point of being identified as the successful lessee, a bidder on federal coal will have invested millions of dollars with no return on the investment. At least another three-to-five years are still required to obtain permits and other authorizations before the coal can actually be mined and sold. During those “permitting” years the mining company will invest many millions more, with no return.

By the time the first ton of coal is authorized to be mined, at least ten years will have typically passed. The coal lessee will have invested a staggering sum of money including the bonus bid on the lease. So the American taxpayer will have begun to realize a return on the resource, but the coal lessee will not have realized any return on the enormous investment.

The size of this investment is critical. On a lease of 500 million tons of coal (for example), the investment when the final permit is issued could be in excess of \$650 million. Most of that is in the form of the lease bonus bid which gets distributed to the federal government and the affected state. There are not too many companies that are willing to risk an investment of that magnitude for at least ten years, with no near-term return on the investment.

Moreover, the size of the lease, and therefore the size of the investment, is a function of the time it takes to acquire the next lease. If it takes 10 years to navigate through the leasing/permitting process, a company must always ensure it has more than 10 years of reserves in order to survive the uncertainties of the program. In other words, because of the length of time it takes to negotiate the process, few entities can afford to participate.

If, the BLM concludes that the foregoing explanation requires fixing, then the BLM must also conclude that increasing royalties or fair market value of the coal will not be the fix to the absence of competitiveness. In fact, the BLM should conclude that increasing royalties or fair market value will further exacerbate the perceived problem. Instead the agency needs to evaluate ways to dramatically cut the elapsed time between applying for a lease and obtaining all authorizations to mine the coal. This will have the added benefit of accelerating the full return on the resource to the American taxpayer.

To reduce the elapsed time, BLM must consider the consolidation of leasing and permitting processes into the hands of fewer agencies. They must evaluate means for eliminating the overlapping requirements and redundant processes. And finally they must consider revising processes that have become attractive as delay tactics by those opposed to coal leasing and mining. Too much of the process today serves not to enhance the leasing process, but instead to facilitate unending delay to the process at increasing cost to the American taxpayer.

2. The investment in a lease is but a small part of the total investment required to mine coal and places limits on those who would choose to participate.

Obtaining a federal coal lease without having the means to mine, process or ship the coal is like getting all dressed up with nowhere to go. The cost of obtaining a federal coal lease represents only a portion of the investment required to mine coal. In order to mine coal for commercial purposes, an operator needs access to mining, processing, maintenance and transportation facilities, equipment and personnel. This means hundreds of millions of dollars of investment in facilities, equipment and employees. Taken in combination with the cost of the coal, these up-front investments represent the billion-dollar ante required to participate in the federal coal leasing process.

The majority of this ante occurs prior to mining a single ton of the coal in a new proposed lease tract. The significance of this is not only the sheer magnitude of the investment, but also the risk associated with the investment. This may be the greatest fact that limits the number of entities who may have the desire to participate in the process. It also discourages speculation in federal coal leases, contrary to claims in recent articles on this subject.

Finally, the federal coal leasing process is inherently risky even without the long-term investment. At any time in the process, the BLM can conclude on the basis of public comment or information collected that some or all of the projected lease area is unsuitable for mining. Indeed, we have seen proposed lease boundaries change during the process. The NEPA process on leasing alone has no less than three opportunities for input or comment and one for appeal. These opportunities have been used religiously by some and prolifically by others to influence the process and sometimes to delay or obstruct the process. The ultimate leasing decision may be appealed administratively and through the courts. Again, we have seen this used often, and there are even incentives to collect federal funds for appealing federal decisions. Appeals delay the process, at a minimum, and may overturn the agency's action altogether. Lastly, the process is a competitive process and there is no guarantee that the applicant for a lease will be the successful bidder, or that the bid will exceed fair market value. Indeed, several instances of both of these outcomes have occurred in the Powder River Basin.

In conclusion, please consider in your scoping process that there are few if any programs in the United States for which the participant pays a higher price and takes a more significant financial risk. Acquisition of a federal coal lease, and authorization to mine, is at least a decade-long process and involves the expenditure of hundreds of millions, sometimes billions of dollars **without a guarantee of success**. The successful lessee requires millions upon millions of dollars of investment in mining, processing, storage and transportation facilities, not to mention the ongoing costs of employees, materials and supplies to operate the facilities. And once successful with a new lease, the lessee earns the right to pay additional royalties, taxes and fees imposed by all levels of government. This is hardly the kind of program that attracts multiple participants. It is not the kind of process that BLM can, through regulatory changes, suddenly attract multiple participants. And yet, for the reasons listed above, it is a program that has worked to provide federal coal resources for the American utility industry and revenue for the American taxpayer for the past 30-40 years.

#### Data or analyses that justify a specific change to the royalty rate

Under today's market conditions, WMA does not believe that an increase to the royalty rate is justified for current or future leases. In fact, recent efforts in Congress to increase royalty rates appear to be punitive with the intention of making the resource non-economical to develop. This will in effect take the coal resource off the table for the future with the inevitable result being no royalty revenue at all. If an adjustment to the royalty rate is considered by BLM, WMA recommends a downward adjustment to keep the coal resource viable and keep revenues flowing.

In addition to data or analyses that justify a change to the royalty rate, BLM must also consider information that justifies no change to the royalty rate. As part of the review process, consider that duplications, redundancies and delays in the current leasing process, as described earlier are all very costly and serve to erode the return to the American taxpayer. BLM should evaluate how the true cost of the typical ten-year leasing/permitting process compares to the return from royalties, bonus bids and taxes. Is the American taxpayer spending more to administer a program when all agency costs are included, than the coal resource brings in? We know how many billions of dollars have been generated in royalties and should be appalled that the process might cost as much. BLM must seriously consider introducing true efficiencies into the process.

The federal leasing process in Wyoming can take five to seven years to complete. Not a single dime is made by an operator on the leasing of coal. Yet leasing is the single largest cost of the multi-step federal coal program, much of which is administered by the Department of Interior. Leasing is also the single most time-consuming step of the total process which often consumes a decade or more.

Leasing does not disturb the ground, does not remove the coal, does not transport the coal and most certainly does not burn the coal. The Department of Interior spends a lot of time evaluating the impacts of all of these activities, and very little time evaluating the cost of the leasing process. This is the opportunity to evaluate the process by asking some of the following questions. During the five to seven years of leasing, how many employees with BLM get involved, and at what cost, on a per ton basis? What are the secondary and tertiary costs of the program? For example, what other Department of Interior employees, lawyers

and multitudes of people in administrative and management positions become involved in the program. The American taxpayer pays for them either directly in the form of taxes or indirectly in the form of user fees passed onto the consumer.

Finally, any increase in royalty rate further reduces competitiveness for the American coal industry. At a time when the federal government is actively supporting preferred energy sources, such as wind and solar, with massive subsidies, tax exemptions and favorable regulatory treatment, any hike in royalty rates for federal coal serves only to further burden the coal industry, increasingly skewing the energy market and depriving taxpayers of important revenue from the federal coal program.

#### Potential approaches to improve the pre-sale estimate of fair market value.

WMA believes calculation of Fair Market Value (FMV) should reflect the current market for the commodity given the realities of the economic conditions. Pre-sale FMV should allow for extraction costs so that the final cost for the generation of electricity is reasonable and affordable. FMV should also be calculated with the goal of ultimately finding a qualified lessee for the coal tract. Artificially increasing the FMV and raising costs above what is economical to mine is counter-productive and contrary to the Agency's charge of managing the responsible development of the resource as mandated by the Mineral Leasing Act.

WMA is concerned about possible artificial inflation of FMV through the use of arbitrary "social cost of carbon" standards. Attempts to artificially increase the FMV on these grounds appear political with the intent of making the resource uneconomical to develop in violation of the Mineral Leasing Act. The cost of excessive manipulation in determining FMV will fall on American consumers. If the agency does choose to pursue this, we would surely recommend the inclusion of a much more empirical "social benefit" standard to include not only the positive economic realities of vital jobs and revenue, schools and infrastructure, but the measurable positive contribution of reliable, low-cost electricity to our country and the world.

WMA supports efforts to increase transparency in the calculation process, and encourages the Agency to draw on the considerable experience and expertise of Wyoming State BLM office staff in studying all of the factors relevant to a FMV determination.

#### Whether, and how, to account in the leasing process for the extent to which reclamation responsibilities have been met.

Direct reclamation oversight is rightly provided by state officials of the Wyoming Department of Environmental Quality (DEQ), and accounting for reclamation in the BLM leasing process is unnecessary. Reclamation progress is painstakingly monitored by the DEQ and is guided by mine plans and staff review. Annual reports are exhaustive and comply with state and federal requirements. Proper state, federal and producer communication should be the avenue to determine if responsibilities have been met. There should be no questions or obstacles to the BLM checking on reclamation activities with the state.

BLM should consult the State DEQ's reclamation records to determine the success of the State's reclamation program. Mine reclamation in Wyoming is an ongoing process that takes place simultaneous with mining activities. It starts before the first shovel of earth is turned,

with the development of a comprehensive plan which is reviewed and approved by federal and state regulatory bodies. Once mining begins, reclamation begins as well. It starts with the careful stockpiling of topsoil, a critical Wyoming resource. As the coal is removed, the resulting void is then backfilled with overburden and contoured in accordance with the approved reclamation plan. Topsoil is replaced and approved seed mixtures are then sowed. Unique and critical wildlife habitat, productive grazing and pastureland, and valuable stream and aquatic resources are created and reclaimed in the process. Progress is monitored by specialists from the mining companies and the state agencies to ensure compliance with rules and, most importantly, to ensure reclamation is successful and sustainable. Only after a multitude of challenging regulatory standards are met and affirmatively demonstrated can the reclamation bond be released. The goal is to return the land to a state equal to or better than the pre-mining condition. This is an overly simplified description of a time-consuming and costly, but robustly successful process. To put it more succinctly, Wyoming coal mines are being reclaimed every single day. Even given today's state of the industry, there has not been a single situation where a Wyoming coal company reclamation obligation has not been met.

To date, an estimated 47 percent of all land disturbed by coal mining in Wyoming since the 1969 state law requiring reclamation has been reclaimed or is in the process of reclamation. The remaining 53 percent of the land consists of active mining pits and facilities, including many acres of supporting activities designed to provide protection of resources and the environment during the mining process. In fact, reclamation in Wyoming has been recognized at both the federal and state levels as arguably the best and most successful efforts in the nation since the enactment of the Surface Mining and Reclamation Act. Wyoming has been managing this effort for 50 years. Now is not the time to invent yet another duplicative regulatory program at the public's expense.

#### Potential approaches to design a 'budget' for the amount of Federal coal and/or acreage to be leased over a given period

WMA believes Federal coal should continue to be leased and produced to meet thermal coal electric generation needs. Arbitrary "budgets" to restrict access to the resource should be avoided. Coal-fired generation will remain a significant part of America's electricity portfolio for the near future. Utility sales contracts vary, and customers do as well. Coal producers are in the best position to gauge rate of extraction and sales based on utility needs, as well as planning for additional reserves. Additionally, the leasing and permitting processes are very time consuming, taking from 7-10 years to complete. Coal producers must be allowed to plan to accommodate this lengthy schedule. Imposing an arbitrary leasing "budget" will only make planning more difficult. A predetermined "budget" restricts the ability of utilities and coal producers to react to ever-changing energy needs and is contrary to the Agency's charge of responsible development of the resource based on the Mineral Leasing Act. WMA believes this approach amounts to unnecessary intervention into the supply and demand of the resource by dictating volumes. We reiterate our position that federal coal leases should continue based on need and not artificial caps under arbitrary, politically driven "budgets."

#### Conclusion.

Should the Interior Department pursue its review of this vital program, we believe it is imperative to look at areas where actual improvements can be made to make the program better. We support addressing the lengthy and costly timeframe for acquiring and processing coal leases, determination of fair market value, and increased transparency. BLM is charged under the Mineral Leasing Act with ensuring the resource is managed responsibly, and we hope that it would take steps to ensure that political efforts to use the Coal Lease Program to further burden industry and curb coal use are avoided. The BLM Federal Coal Lease Program creates great value for taxpayers and those who rely on affordable electricity. No one is being shortchanged. While there may be room for process improvement, continuing the program is certainly in the best interest of Wyoming and the United States.

The Wyoming Mining Association also supports comments submitted by Wyoming Governor Mark Gordon and the National Mining Association.

Thank you for the opportunity to provide input on the very important issue.

Best regards,



Travis Deti  
Executive Director

CC: The Honorable Mark Gordon, Governor of Wyoming  
The Honorable John Barrasso, MD, United States Senator  
The Honorable Cynthia Lummis, United States Senator  
The Honorable Liz Cheney, United States Representative  
Ms. Katie Sweeney, National Mining Association